

ATTACHMENT C

**CALIFORNIA MUNICIPAL WASTE COMBUSTOR
FACILITY AND EMISSION INVENTORIES**

Table C-1. California MWC Facility Inventory

District	Facility Name	Facility Address	Control Equipment^{1,2}	Permit Capacity	Startup Date
South Coast AQMD	<i>Southeast Resource Recovery Facility (SERRF)</i> owner: Joint Powers Authority ³ operator: Montenay Pacific Power Corporation	120 Henry Ford Avenue Long Beach, CA 90802 (Los Angeles County)	NH ₃ Injection Lime SD/FF	1380 tpd 3 units (460 tpd ea.)	1988
	<i>Commerce Refuse to Energy Authority (CREA)</i> owner: Los Angeles County Sanitation District (LACSD)/City of Commerce operator: LACSD	5926 Sheila Street Commerce, CA 90040 (Los Angeles County)	NH ₃ Injection Lime SD/FF	400 tpd 1 unit	1987
San Joaquin Valley Unified APCD	<i>Stanislaus County Resource Recovery Facility (Stanislaus)</i> owner: Ogden-Martin Systems (OMSS) operator: OMSS	4040 Fink Road PO Box 278 Crows Landing, CA 95313 (Stanislaus County)	NH ₃ Injection Lime SD/FF	800 tpd 2 units (400 tpd ea.)	1988

1. NH₃ means ammonia; SD/FF means spray dryer/fabric filter.

2. All units at each facility have the same type of air pollution control equipment.

3. The Joint Powers Authority consists of the Los Angeles County Sanitation District (LACSD) and the City of Long Beach

Table C-2. California MWC Emission Rates

Pollutant	Reporting Units ¹	SERRF ²			CREA ³	Stanislaus ⁴		USEPA EG
		Unit 1	Unit 2	Unit 3		Unit 1	Unit 2	
Nitrogen Oxides (NO _x)	ppmv	80	81	78	88	140	146	205
Carbon Monoxide (CO)	ppmv	76	55	93	65	12	18	100
Particulate Matter (PM)	grains/dscf	0.0036	0.0036	0.0036	0.011	0.0058	0.0068	0.012
Sulfur Dioxide (SO ₂)	ppmv	0.5	1.5	3.2	7.1	5	9	29
Hydrochloric Acid (HCl)	ppmv	2.4	2.4	2.4	13	2	2	29
Dioxins/Furans	ng/dscm	0.1	0.1	0.1	8.3	25	25	30
Lead (Pb)	mg/dscm	7.02E-05	3.7E-03	1.27E-03	2.1E-03	3.68E-05	3.68E-05	4.4E-01
Cadmium (Cd)	mg/dscm	<1.1E-04	<1.1E-04	<1.1E-04	<1.0E-04	4.46E-04	4.46E-04	4.0E-02
Mercury (Hg)	mg/dscm	7.1E-03	1.8E-02	6.0E-03	<1.7E-03	1.35E-01	1.66E-01	8.0E-02

1. Emissions corrected to 7% O₂, unless otherwise noted; ppmv means parts per million by volume; dscf means dry standard cubic feet; ng means nanogram; mg means milligram; dscm means dry standard cubic meter; all numbers have been rounded.

2. SERRF emissions from July 1997 source test (CEMS and stack sampling).

3. CREA emissions from November 1997 source test (CEMS and stack sampling).

4. Stanislaus emissions from May 1997 source test (CEMS and stack sampling). Emissions have been corrected to 12% CO₂.

Table C-3. California MWC Annual Emissions Inventory¹

Pollutant	SERRF [tons per year]			CREA [tons per year]		Stanislaus ³ [tons per year]	
	Unit 1	Unit 2	Unit 3	USEPA EG ²	Unit 1	Unit 2	USEPA EG ²
Nitrogen Oxides (NO _x)	104	105	102	267	100	165	267
Carbon Monoxide (CO)	60	44	74	79	45	12	79
Particulate Matter (PM)	5.5	5.5	5.5	19	15	9.2	19
Sulfur Dioxide (SO ₂)	0.9	2.7	5.8	53	11	14	53
Hydrochloric Acid (HCl)	2.5	2.5	2.5	30	12	1.8	30
Dioxins/Furans	6.8E-08	6.8E-08	6.8E-08	2.0E-05	4.9E-06	1.5E-05	2.0E-05
Lead (Pb)	4.8E-05	2.5E-03	8.2E-04	3.0E-01	1.2E-03	2.2E-03	3.0E-01
Cadmium (Cd)	7.5E-05	7.5E-05	7.5E-05	2.7E-02	5.9E-05	2.6E-04	2.7E-02
Mercury (Hg)	4.7E-03	1.2E-02	4.1E-03	5.5E-02	1.0E-03	9.9E-02	5.5E-02

1. Data used to calculate annual emissions is taken from Table C-2. Annual emission calculations are based on the emission rates presented in Table C-1 and are a function of the total amount of MSW processed each year. For comparison purposes, it is assumed that each unit operates at its total physical capacity and for 365 days each year. All numbers have been rounded.

2. U.S. EPA guideline emissions based on source process rates for comparison purposes.

3. Data corrected to 12% CO₂ (per source test reports).

**Table C-4. Summary of Current Emissions from California MWCs
Compared to U.S. EPA Guideline Emissions¹**

Pollutant	California MWC Emissions		U.S. EPA Guideline Emissions	
	[tons/yr]	[Mg/yr]	[tons/yr]	[Mg/yr]
Nitrogen Oxides (NO _x)	735	668	1498	1362
Carbon Monoxide (CO)	243	221	445	404
Particulate Matter (PM)	48	44	105	96
Sulfur Dioxide (SO ₂)	43	39	295	268
Hydrochloric Acid (HCl)	23	21	168	153
Dioxins/Furans	3.5E-05	3.2E-05	1.15E-04	1.04E-04
Lead (Pb)	0.0089	0.0081	1.6823	1.5293
Cadmium (Cd)	8.1E-04	7.4E-04	1.534E-01	1.39E-01
Mercury (Hg)	0.20	0.18	0.31	0.28

1. Values are total maximum emissions from all affected facilities based on an 365 day per year operating schedule and have been rounded.

ATTACHMENT D
PUBLIC PARTICIPATION

San Joaquin Valley Unified Air Pollution Control District

**NOTICE OF PUBLIC HEARING
ADOPTION OF A STATE PLAN
TO IMPLEMENT FEDERAL EMISSION
GUIDELINES FOR LARGE MUNICIPAL
WASTE COMBUSTORS.**

NOTICE IS HEREBY GIVEN that a public hearing will be held on April 16, 1998, at 10:00 am, or as soon thereafter as may be heard, at 1999 Tuolumne Street, Fresno, California. At said hearing, the Governing Board of the San Joaquin Valley Unified Air Pollution Control District will consider adoption of one part of a California State Plan to comply with the requirements of the Federal Emissions Guidelines for Large Municipal Waste Combustors.

The part of the State Plan to be considered at this hearing applies to the Ogdan Martin Systems municipal waste combustion facility located at 4040 Fink Road in Crows Landing. The Permit to Operate for this facility will be submitted to implement the requirements of title 40, Code of Federal Regulations (CFR), Part 60, as amended, Subpart CB (Emissions Guidelines for Large Municipal Waste Combustion Units). The partial plan includes identification of legal authority, the Permit to Operate for the Ogdan Martin Systems facility, an emission inventory, emission limits, compliance schedules, public hearing requirements, reporting and record keeping requirements, and requirements for annual progress reports. If adopted by the District governing Board, the partial plan will be transmitted to the California Air Resources Board, combined with other partial plans that apply to facilities in other California air districts, and submitted to the U.S. Environmental Protection Agency to satisfy the plan submittal requirements of the Federal Emission Guidelines.

NOTICE IS FURTHER GIVEN that interested persons desiring to be heard or present evidence on this matter may appear at said hearing. Interested persons may view the proposed rules at the District Northern Region office which is located at 4230 Kiernan Avenue, Suite 130, in Modesto, CA. Further information and copies of the partial plan may be obtained by contacting Chris Valverde at (209) 545-7000, or by FAXing a request to Mr. Valverde at (209) 545-8652. Written comments should be addressed to Seyed Sadredin, SJVUAPCD, 1999 Tuolumne Street, Suite 200, Fresno, CA 93721.

March 16, 1998



COPY

San Joaquin Valley

Unified Air Pollution Control District

Governing Board:

Tony Barba

Chair
Supervisor, Kings County

Kenni Friedman

Vice Chair
Councilmember, City of Modesto

Tom Perch

Supervisor, Fresno County

Barbara Patrick

Supervisor, Kern County

Gail Hanhart McIntyre

Supervisor, Madera County

Jerry O'Banion

Supervisor, Merced County

Robert J. Cabral

Supervisor, San Joaquin County

Dennis Lujan

Councilmember, City of Selma

Nick W. Blom

Supervisor, Stanislaus County

William Sanders

Supervisor, Tulare County

Claude Retherford

Mayor, City of Tulare

David L. Crow

*Executive Director/
Air Pollution*

Control Officer

1999 Tuolumne Street, Suite #200
Fresno, CA 93721
(209) 497-1000
Fax (209) 233-2057

Northern Region

4230 Kiernan Avenue, Suite #130
Modesto, CA 95356
(209) 545-7000
Fax (209) 545-8652

Central Region

1999 Tuolumne Street, Suite #200
Fresno, CA 93721
(209) 497-1000
Fax (209) 233-2057

Southern Region

2700 M Street, Suite #275
Bakersfield, CA 93301
(805) 862-5200
Fax (805) 862-5201

GOVERNING BOARD AGENDA

THURSDAY

April 16, 1998

10:00 A.M.

Central Region Office

First Floor Meeting Room

1999 Tuolumne Street, Fresno

- Notes:
- A. The meeting of the San Joaquin Valleywide Air Pollution Study Agency WILL NOT be held immediately prior to this meeting.
 - B. Please provide 15 copies of any information intended for use at Governing Board Meetings to the Clerk to the Board prior to the meeting.
 - C. The Governing Board relies on the credibility of witnesses and the veracity of testimony on matters brought before this Board for action.
 - D. If you are providing testimony and/or attending the meeting please put your name on the Sign In Sheet located at the entrance door.
1. CALL TO ORDER
 2. ROLL CALL
 3. APPROVAL OF CONSENT CALENDAR Items Number (16-25).
(These matters are routine in nature and are usually approved by a single vote. Prior to action by the Board, the public will be given the opportunity to comment on any consent item.)
 4. PUBLIC COMMENT This time is made available for comments from the public on matters within the Board's jurisdiction that are not on the Agenda. It is requested that no comments be made during this period on items on the Agenda. The public may make comments on each Board Agenda Item during the time allowed for public comment. Attention is called to the fact that the Board is prohibited by law from taking any action on matters discussed that are not on the Agenda.
 5. REPORT FROM CITIZENS ADVISORY COMMITTEE

6. **APPROVE RECOMMENDATION OF THE PHASE V - 1997 REMOVE PROGRAM EVALUATION COMMITTEE FOR MOTOR VEHICLE EMISSION REDUCTIONS TO FUND 44 PROJECTS FOR \$5,309,952**
7. **APPROVE BUDGET RESOLUTION WHICH ALLOCATES \$1,240,048 OF DMV SURCHARGE FEE REVENUE TO THE HEAVY-DUTY MOTOR VEHICLE EMISSION REDUCTION INCENTIVE PROGRAM**
8. **PUBLIC HEARING: ADOPT PROPOSED AMENDMENTS TO RULE 4354 (GLASS MELTING FURNACES)** - Recommend adopting amendments to establish Best Available Retrofit Control Technology (BARCT) requirements for NOx emissions from flat glass, fiberglass and container glass melting furnaces, pursuant to the 1994 Ozone Attainment Demonstration Plan.
9. **PUBLIC HEARING: ADOPT PROPOSED AMENDMENTS TO RULE 4642 (SOLID WASTE DISPOSAL SITES)** - Recommend adopting amendments to exempt landfills subject to the federal Emission Guidelines for municipal solid waste landfills.
10. **PUBLIC HEARING: APPROVE SUBMITTAL OF DISTRICT PERMIT TO OPERATE N-2073-1-2 (OGDEN MARTIN SYSTEMS FACILITY, STANISLAUS) TO THE CALIFORNIA AIR RESOURCES BOARD AS PART OF THE STATE PLAN TO IMPLEMENT 40 CFR 60, SUBPART CB**
11. **APPROVE PURCHASE OF VALLEY CHILDREN'S PROFESSIONAL CENTER TO HOUSE DISTRICT'S CENTRAL REGION OFFICE**
12. **VERBAL REPORT: CALIFORNIA AIR RESOURCES BOARD (CARB) BOARD MEETING** - Report from Governing Board Member Supervisor Barbara Patrick regarding the March, 1998 CARB Board Meeting.
13. **EXECUTIVE DIRECTOR/APCO COMMENTS**
14. **GOVERNING BOARD MEMBER COMMENTS**
15. **CLOSED SESSION - (NONE)**

OTHER BUSINESS

ADJOURN



San Joaquin Valley Unified Air Pollution Control District

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Supervisor, Kings County

Kenni Friedman

Vice Chair
Councilmember, City of Modesto

Tom Perch

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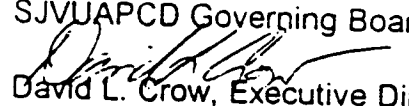
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Southern Region

2790 M Street, Suite #275
Bakersfield, CA 93301
(805) 862-5200
Fax: (805) 862-5201

DATE: April 16, 1998

TO: SJVUAPCD Governing Board

FROM: 
David L. Crow, Executive Director/APCO
Project Coordinator: Seyed Sadredin

RE: APPROVE SUBMITTAL OF DISTRICT PERMIT TO
OPERATE N-2073-1-2 TO THE CALIFORNIA AIR
RESOURCES BOARD AS PART OF THE STATE PLAN
TO IMPLEMENT 40 CFR 60, SUBPART CB

RECOMMENDATION:

Authorize the Executive Director/APCO to submit District Permit to Operate N-2073-1-2 for the Ogden Martin Systems facility to the California Air Resources Board for inclusion in the California State Plan to implement Title 40 Code of Federal Regulations (CFR), Part 60, Subpart Cb (Emission Guidelines and Compliance Schedules for Municipal Waste Combustors). See attached resolution.

BACKGROUND:

Sections 111(d) and 129 of the Federal Clean Air Act (FCAA), as amended in 1990, required the United States Environmental Protection Agency (U.S. EPA) to develop and adopt performance standards and emission guidelines for new and existing Municipal Waste Combustor (MWC) units. The FCAA requires that the emission standards be based upon the maximum achievable control technology (MACT) for the specified criteria air contaminants and hazardous air contaminants which are typically emitted from MWC units.

On December 19, 1995 the U.S. EPA promulgated regulations for large and small MWC units, thus implementing Sections 111(d) and 129 of the FCAA. The regulations included Emission Guidelines (Guidelines) which pertain to existing MWC units that were constructed on or before September 20, 1994 and combust more than 250 tons per day of

April 16, 1998

municipal solid waste. These Guidelines, however, are not self implementing and require each state to develop a mechanism for enforcing their requirements as a part of a "State Plan" to the U.S. EPA in accordance with 40 CFR 60, Subpart B (Adoption and Submittal of State Plans for Designated Facilities). The State Plan must identify how the affected facilities within the state will comply with the federal requirements outlined in the Guidelines. To obtain U.S. EPA approval, the State Plan must contain enforceable requirements that are deemed to be at least as protective as those specified in the Guidelines.

The Guidelines establish emission limitations for oxides of nitrogen, carbon monoxide, sulfur dioxide, particulate matter, dioxins and furans, cadmium, lead, mercury and hydrochloric acid. Requirements for stack opacity and fugitive emission control on ash handling are also included. There are requirements for operator training and certification. Shift supervisors and facility operators must be certified through the American Society of Mechanical Engineers (ASME) or an equivalent state program. In addition, there are enhanced monitoring and recordkeeping requirements, including submission of semi-annual and annual reports.

There are only three (3) active MWC facilities in the State of California which were constructed before September 20, 1994 and combust more than 250 tons of municipal solid waste per day. Two are located in the South Coast Air Quality Management District and the third is the Ogden Martin Systems (Ogden) facility located at 4040 Fink Road in Stanislaus County, approximately five miles south of the City of Patterson and one mile west of Interstate 5. Ogden Martin Systems operates two (2) parallel MWC units, each capable of combusting up to 400 tons per day of municipal solid waste. The Ogden facility is prohibited from combusting any type of hazardous material or hazardous waste.

Federal regulations require that the public be provided the opportunity to comment on any proposed State Plan. A notice advising the public of this hearing was placed in the Modesto Bee on March 16, 1998, thus commencing a 30 day period for review of the draft State Plan and solicitation of comments.

DISCUSSION:

Normally, the District adopts a rule meeting the federal requirements, as the enforcement vehicle for inclusion in a State Plan. However, in this case, the facility's Permit to Operate will be submitted in lieu of a rule for the following reasons:

- 1) There is only one facility that is affected by the federal regulation. Therefore, a lengthy and labor intensive rule making process is not warranted.

April 16, 1998

- 2) Using the facility's local permit allows for compliance with the federal requirements while offering the source maximum flexibility.
- 3) The facility already complies with most of the substantive requirements under the Federal Guidelines. Only minor amendments to the existing permit were necessary to comply with the Federal requirements as specified in the Guidelines.
- 4) The California State Attorney General has certified that the local districts have the authority to modify existing operating permits to incorporate the requirements set forth in the Guidelines.

The original Authority to Construct for Ogden facility was issued by the District in August 1986 and the facility began combusting municipal solid waste in September 1988. The initial permit application was subject to a comprehensive review, including compliance with the Best Available Control Technology (BACT) and offset requirements of the district's New Source Review Rule. Consequently, the facility was designed and built with several highly effective control technologies in order to satisfy BACT requirements. A thermal de-NO_x system utilizing ammonia injection reduces oxides of nitrogen emissions by 80 percent. Dry lime scrubbers and lime slurry injection reduce sulfur dioxide emissions by 80 percent. A multi-compartment baghouse reduces particulate matter emissions by 99 percent. Additionally, the combustion zone was designed to maintain the combustion gases at a minimum of 1,800 degrees F for at least one second, thus ensuring that volatile organic compound emissions are reduced by at least 98 percent. The high combustion zone temperature is also very effective in controlling the emissions of carbon monoxide and hazardous organic compounds such as dioxins and furans.

The original application review also included a comprehensive health risk assessment (HRA) to determine if there could be a significant health impact to any persons residing or working in the vicinity. The HRA addressed the potential health effects from exposure to conservatively estimated quantities of 14 heavy metals such as cadmium, chromium, lead and mercury, as well as hazardous organic compounds such as dioxins and furans, polychlorinated biphenyls (PCBs) and polycyclic aromatic hydrocarbons (PAHs). Based upon this analysis, the health impact over the 70-year life of a hypothetical maximally exposed individual was determined to be less than significant.

The local permits contain adequate provisions for compliance verification which meet or exceed Federal requirements. Continuous emission monitoring systems are used to demonstrate ongoing compliance with oxides of nitrogen, carbon monoxide, sulfur dioxide and opacity emission limitations. Annual source testing is required for volatile organic compounds, particulate matter, dioxins and furans, PAHs, PCBs and heavy metals. All source test results are compared to the maximum emission concentrations

April 16, 1998

specified on the Permit to Operate and in the HRA to ensure that there is no increase in the calculated health risk.

Due to the use of highly effective control technologies which were approved as BACT in 1986, the current permitted emission limitations for the Ogden Martin Systems facility are already below all of the emission limitations specified in the Guidelines, with the exception of carbon monoxide and mercury. Although the current permit limitation for carbon monoxide is 400 parts per million by volume, the actual carbon monoxide emission rate at the facility is below the 100 parts per million by volume level specified in the Guidelines. The actual mercury emission rate exceeds the level specified in the Guidelines and thus the facility is required to retrofit with additional control equipment to reduce mercury emissions either to 0.080 milligrams per dry standard cubic meter or achieve a minimum removal efficiency of 85%, whichever is less stringent. The existing permit was modified to require compliance with the reduced mercury emission limitation on or before December 19, 2000. The local permit includes specific increments of progress for the design, approval and installation of any additional control equipment necessary to achieve compliance with all new emission limitations on the permit.

The U.S. EPA has six (6) months to review and approve or disapprove a State Plan. If the Federal Plan is promulgated prior to State Plan approval, the Ogden Martin Systems facility will be subject to compliance with the Federal Plan. However, this is considered to be an interim action because the Federal Plan contains provisions to exempt any MWC unit once it is covered by an approved State Plan.

FISCAL IMPACT

No fiscal impact to the District is expected as a result of this action.

Attachments:

Adoption Resolution (3 pages)

Permit to Operate N-2073-1-2 issued to Ogden Martin Systems (9 pages)

Notice of Public Hearing (1 page)

California State Plan for Municipal Waste Combustors (DRAFT) (48 pages)

BEFORE THE GOVERNING BOARD OF THE
SAN JOAQUIN VALLEY UNIFIED
AIR POLLUTION CONTROL DISTRICT

IN THE MATTER OF:

RESOLUTION NO. 98-04-12

APPROVE SUBMITTAL OF DISTRICT
PERMIT TO OPERATE N-2073-1-2 TO
THE CALIFORNIA AIR RESOURCES
BOARD AS PART OF THE STATE PLAN
TO IMPLEMENT 40 CFR 60, SUBPART
CB

RECEIVED

APR 20 1998

SAN JOAQUIN VALLEY
UNIFIED A.P.C.D.
NO. REGION

WHEREAS, the San Joaquin Valley Unified Air Pollution Control District ("District") is a duly constituted unified air pollution control district, as provided in California Health and Safety Code sections 40150 to 40161;

WHEREAS, Sections 111(d) and 129 of the Federal Clean Air Act (FCAA), as amended in 1990, required the United States Environmental Protection Agency (U.S. EPA) to develop and adopt performance standards and emission guidelines for new and existing Municipal Waste Combustor (MWC) units;

WHEREAS, On December 19, 1995, the U.S. EPA as required by Sections 111(d) and 129 of the FCAA promulgated Emission Guidelines (Guidelines) which pertain to existing MWC units that were constructed on or before September 20, 1994 and combust more than 250 tons per day of municipal solid waste.

WHEREAS, the Guidelines are not self implementing and require each state to develop a mechanism for enforcing their requirements as a part of a "State Plan" to the U.S. EPA in accordance with 40 CFR 60, Subpart B (Adoption and Submittal of State Plans for Designated Facilities);

WHEREAS, the District is committed to comply with the requirements of the FCAAA;

WHEREAS, the District has the authority to modify existing operating permits to incorporate the requirements set forth in the Guidelines;

1 **WHEREAS**, the Ogden Martin Systems MWC facility located at 4040 Fink
2 Road in Stanislaus County is subject to the Guidelines;

3 **WHEREAS**, the Permit to Operate for Ogden Martin Systems MWC
4 facility contains adequate conditions to assure compliance with all applicable
5 requirements;

6 **WHEREAS**, the State Plan must be approved by the District and then
7 submitted to the Air Resources Board ("ARB") for subsequent state transmittal to the
8 USEPA; and

9 **WHEREAS**, a public hearing for the adoption of the Plan was duly
10 noticed and held on April 16, 1998;

11 **WHEREAS**, this Board concurs with the recommendations of its staff;

12 **NOW, THEREFORE**, be it resolved as follows:

13 1. The Governing Board hereby Authorizes the Executive
14 Director/APCO to submit District Permit to Operate N-2073-1-2 for the Ogden Martin
15 Systems facility to the California Air Resources Board for inclusion in the California
16 State Plan to implement Title 40 Code of Federal Regulations (CFR), Part 60,
17 Subpart Cb (Emission Guidelines and Compliance Schedules for Municipal Waste
18 Combustors). A copy of said Permit to Operate is attached hereto and incorporated
19 herein as Exhibit "A."

20 2. The Governing Board hereby finds, based on the evidence and
21 information presented at the hearing upon which its decision is based, all notices
22 required to be given by law have been duly given in accordance with Health and
23 Safety Code section 40725, and the Board has allowed public testimony in
24 accordance with Health and Safety Code section 40726.

25 3. The Governing Board of the District requests that the ARB
26 authorize its Executive Officer to District Permit to Operate N-2073-1-2, in the State
27 Plan for submittal to the USEPA.

28 ///

1 THE FOREGOING was passed and adopted by the following vote of the
2 Governing Board of the San Joaquin Valley Unified Air Pollution Control District this
3 16th day of April, 1998, to wit:

4 AYES: Boardmembers: Sanders, Lujan, Hanhart McIntyre,
5 O'Banion, Blom, Cabral, Friedman and Barba.

6 NOES: None.

7
8 ABSENT: Boardmembers: Patrick, Retherford and Perch.

9
10 SAN JOAQUIN VALLEY UNIFIED
11 AIR POLLUTION CONTROL DISTRICT

12 By Tony Barba
13 Tony Barba, Chair
14 Governing Board

15 ATTEST:
16 Clerk to the Governing Board

17 By Sissy Smith
18 Sissy Smith

19 reso.doc
20
21
22
23
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26
27
28

South Coast Air Quality Management District



South Coast Air Quality Management District

21865 E. Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • <http://www.aqmd.gov>

April 10, 1998

Richard Boyd
Air Resources Engineer
California Air Resources Board
2020 L Street
Sacramento, CA 95812

Subject: Public Response Regarding the Proposed Public Hearing Notice for Adoption of a State Plan to Implement the Code of Federal Regulations Emission Guidelines for Large Municipal Waste Combustion Units

Dear Mr. Boyd:

On February 19, 1998 the AQMD noticed in five local newspapers throughout the District an opportunity to hold a public hearing on Thursday March 26, 1998 as part of a proposed State Plan to implement the Code of Federal Regulations Emissions Guidelines for large municipal waste combustion units, provided that there was public interest in holding a hearing.

Notice was given that anyone interested in attending this public hearing should provide a written request to the AQMD on or before Thursday March 19, 1998. Notice was also given that anyone interested in providing written comment should do so on or before Thursday March 19, 1998.

This letter is to inform you that the AQMD received no written requests indicating interest in attending a public hearing; the AQMD received no written comments regarding the proposed public hearing; and the AQMD received no comments, written or verbal, regarding the adoption of the State Plan to implement the Code of Federal Regulations Emission Guidelines for large municipal waste combustion units.

If you have any questions please call me at (909) 396-2684.

Sincerely,

A handwritten signature in cursive script that reads "Charles Tupac".

Charles Tupac
Senior Air Quality Engineer
Public Facilities Unit

CDT:RL

\\MSW\Letter\rboyd

(2015.5 C.C.P.)

STATE OF CALIFORNIA,
County of Los Angeles,

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of the Long Beach Press-Telegram, a newspaper of general circulation, printed and published 7 times each week in the City of Long Beach, County of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the date of March 21, 1934.

Case Number 370512; that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

Feb. 19,

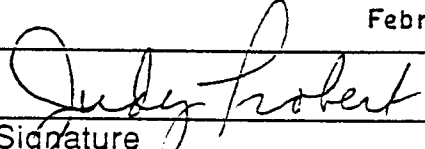
all in the year 19 98.

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Long Beach, California, this _____

_____ 19th _____ day of

February, 19 98

Signature 

Press-Telegram

- Legal Advertising Department
604 Pine Avenue, Long Beach, CA 90844
(213) 499-1236

This space is for the County Clerk's Filing Stamp

Proof of Publication of CNS1569436

Notice of Opportunity for a Public

Hearing Display (Legal) Main News

NOTICE OF OPPORTUNITY FOR A PUBLIC HEARING PROPOSED ADOPTION OF PART OF A STATE PLAN TO IMPLEMENT THE CODE OF FEDERAL REGULATIONS EMISSION GUIDELINES FOR LARGE MUNICIPAL WASTE COMBUSTION UNITS

NOTICE IS HEREBY GIVEN that, if the public so requests, a public hearing on the adoption of part of a California State Plan for Municipal Waste Combustors to implement Federal emission guidelines for municipal waste combustors will be held at 9:00 AM on Thursday, March 26, 1998, at the South Coast Air Quality Management District (AQMD), 21865 E. Copley Drive, Diamond Bar, California, at which time evidence will be taken and all interested persons will be heard. If a hearing is held, interested persons may attend and submit oral or written statements at the hearing.

NOTICE IS FURTHER GIVEN that anyone interested in attending this public hearing must provide a written request on or before Thursday, March 19, 1998. If there is no written request for a public hearing the public hearing will not be held. Written notice or any written comments should be sent to the attention of Charles Tupac, Senior Air Quality Engineer, South Coast Air Quality Management District, P.O. Box 4937, Diamond Bar, CA 91765-0937, (Fax No.: 909-396-3341; email address: ctupac@aqmd.gov). Written comments must be received by March 19, 1998.

NOTICE IS FURTHER GIVEN that the State Plan is necessary to comply with the requirements of Title 40, Code of Federal Regulations (CFR), Part 60, as amended Subpart Cb - Emission Guidelines for Large Municipal Waste Combustion Units. The amendment affects the applicability of the guidelines and standards, and adds supplemental emission limits for four pollutants (hydrogen chloride, sulfur dioxide, nitrogen oxides, and lead) to the guidelines.

NOTICE IS FURTHER GIVEN that the subject part of the State Plan applies to the following two municipal waste combustion facilities which exist in the AQMD and are affected by this amendment: Commerce Refuse to Energy Authority, located at 5926 Sheila Street, Commerce; and Long Beach City SERRF Project, located at 120 Henry Ford Avenue, Long Beach. The permits to operate for these two facilities are being revised to comply with the requirements of the 40CFR Part 60, Subpart Cb.

NOTICE IS FURTHER GIVEN that the California Air Resources Board and AQMD have prepared the subject part of the State Plan to include the following elements: identification of legal authority, identification of mechanisms for implementation (i.e., revised draft permits to operate for the Commerce Refuse to Energy Authority and for the Long Beach City SERRF Project), inventory of affected facilities, emission inventory, emission limits, compliance schedules, public hearing requirements, reporting and record keeping requirements, and annual progress reports. The above documents are available for review at the AQMD's Public Information Center, or may be obtained by contacting Ronald Lem, Air Quality Engineer, South Coast Air Quality Management District, P.O. Box 4937, Diamond Bar, CA 91765-0937, (909) 396-2654.

California Newspaper Service Bureau

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DECLARATION

I am a resident of Los Angeles County, over the age of
eighteen years and not a party to or interested in the matter
noticed.

The notice, of which the annexed is a printed copy
appeared in the:

RIVERSIDE PRESS ENTERPRISE

on the following dates:

FEBRUARY 19, 1998

I certify (or declare) under penalty of perjury that the foregoing
is true and correct.

Dated at Los Angeles, California, this

23RD day of **MARCH**, 19 **98**

Signature

CNS 1569551

*"The only Public Notice which is justifiable
from the standpoint of true economy and the public interest,
is that which reaches those who are affected by it."*

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California Newspaper Service Bureau
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DECLARATION

I am a resident of Los Angeles County, over the age of
eighteen years and not a party to or interested in the matter
noticed.

The notice, of which the annexed is a printed copy
appeared in the:

SUN (SAN BERNARDINO)

on the following dates:-

February 19, 1998

I certify (or declare) under penalty of perjury that the foregoing

is true and correct.

Dated at Los Angeles, California, this

18th day of Mar., 19 98

Debbie Ryer

Signature

CNS1569552

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from the standpoint of true economy and the public interest,
is that which reaches those who are affected by it."

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FOR LARGE MUNICIPAL WASTE COMBUSTION UNITS**

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NOTICE IS FURTHER GIVEN that the California Air Resources Board (CARB) and AQMD have prepared the subject part of the State Plan to include the following elements: identification of legal authority, identification of mechanical and electrical equipment, revised draft permits to operate for the Commerce Refuse to Energy Authority and for the Long Beach City SERRF Project, inventory of facilities, emission inventory, emission limits, compliance schedules, public participation requirements, reporting and record keeping requirements, and annual progress reports. The above documents are available for review at the AQMD's Public Information Center, or may be obtained by contacting Ronald Lem, Air Quality Engineer, South Coast Air Quality Management District, P.O. Box 4937, Diamond Bar, CA 91765 (909) 396-2654.

PROOF OF PUBLICATION
(2015.5 C.C.P.)

This space is for the County Clerk's Filing Stamp

STATE OF CALIFORNIA,
County of Los Angeles,

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of the

Daily News

a newspaper of general circulation, printed and published 7 times weekly in the Cities of Los Angeles, Burbank & San Fernando, County of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the date of May 26, 1983, Case Number Adjudication #C349217; that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

Feb 19

all in the year 19 98

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Woodland Hills,

California, this 19 day of Feb, 19 98

Karen Keap

Signature

Proof of Publication of

CN51569447

Paste Clipping
of Notice
SECURELY
In This Space

NOTICE OF OPPORTUNITY FOR A PUBLIC HEARING
PROPOSED ADOPTION OF PART OF A STATE PLAN TO IMPLEMENT
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The Orange County Register

STATE OF CALIFORNIA
County of Orange

I am a citizen of the United States; I am over the age of eighteen years; I am not a party to or interested in the notice published. I am a Legal Advertising Clerk of the Publisher of the ORANGE COUNTY REGISTER, a newspaper of general circulation, printed and published daily in the City of Santa Ana, County of Orange. The ORANGE COUNTY REGISTER has been adjudged a newspaper of general circulation by the Superior Court of the County of ORANGE, State of California, under the date of November 29, 1905, Case Number A21046. The notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

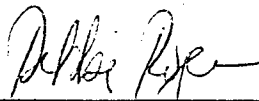
February 19,

all in the year 19 98

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated, this

23rd day of February, 19 98



Signature

CNS 1569549

California Newspaper Service Bureau
1-800-788-7840

Offices in Los Angeles, Sacramento, San Francisco, and Santa Ana

**NOTICE OF OPPORTUNITY FOR A PUBLIC HEARING
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158873

ATTACHMENT E

**DEMONSTRATION OF EQUIVALENCY BETWEEN
STANDARDIZATION TO 12% CO₂ VS 7% O₂**

OGDEN MARTIN SYSTEMS OF STANISLAUS

Development of the State 111(d) Plan: Proposed Permit to Operate No. 2073-1 (PTO) Conditions Incorporation of the MACT Standards under 40 CFR Part 60 Subpart Cb

Objective: To establish the relationship between Oxygen (O₂) and Carbon Monoxide (CO₂) levels in the flue gas of each combustion unit exhaust of the Ogden Martin System of Stanislaus facility located in Crows Landing, California.

Background: The diluent correction factor is basically a multiplication factor that “converts” measured or “raw” pollutant readings to “corrected” or standardized levels. The diluent gas may be O₂ or CO₂. This multiplication factor uses a ratio of the desired standard diluent percent to the measured or actual diluent in the flue gas. The diluent correction factors for 7% O₂ and 12% CO₂ are presented below.

$$\text{Correction Factor for 7\% O}_2: \frac{20.9\% \text{ O}_2 - 7\% \text{ O}_2}{20.9\% \text{ O}_2 - \% \text{ O}_2 \text{ (measured)}} \quad \text{40 CFR 60 eq. 20-4}$$

$$\text{Correction Factor for 12\% CO}_2: \frac{12\% \text{ CO}_2}{\% \text{ CO}_2 \text{ (measured)}} \quad \text{40 CFR 60 eq. 20-5}$$

The current Permit to Operate issued by the SJVUAPCD and the Prevention of Significant Deterioration Permit issued by US EPA Region IX requires that all emission levels are corrected using the 12% CO₂ diluent correction factor to demonstrate compliance with the emission limits. As allowed by 40 CFR 60 Subpart Eb 60.58b, referenced by 40 CFR 60 Subpart Cb 60.38b, the relationship between O₂ and CO₂ can be established during a performance (annual compliance) test. The facility requests to maintain the 12% CO₂ diluent correction factor in the existing permit and in the State 111(d) Plan, therefore, retaining the use of the existing CO₂ continuous monitoring system and maintaining consistency with all operating permit and local regulations and rules.

Relationship: Using the source test data from July 1996 and May 1997, the following O₂ and CO₂ levels were determined by EPA Method 3. The O₂ and CO₂ levels indicated below are the average of three test runs.

July 1996								
Constituent	Unit #1				Unit #2			
	CO ₂ % actual	12%CO ₂ factor	O ₂ % actual	7%O ₂ factor	CO ₂ % actual	12%CO ₂ factor	O ₂ % actual	7%O ₂ factor
CEMS	8.9	1.3	10.7	1.4	8.6	1.4	10.9	1.4
HCl	8.4	1.4	11.3	1.4	8.2	1.5	11.6	1.5
Hg	8.4	1.4	11.3	1.4	8.4	1.4	11.3	1.4
PM	8.4	1.4	11.3	1.4	8.2	1.5	11.6	1.5
PCDD/PCDF	8.7	1.4	11.0	1.4				
PAH	8.7	1.4	11.0	1.4				
Metals					8.6	1.4	11.1	1.4

May 1997								
Constituent	Unit #1				Unit #2			
	CO ₂ % actual	12%CO ₂ factor	O ₂ % actual	7%O ₂ factor	CO ₂ % actual	12%CO ₂ factor	O ₂ % actual	7%O ₂ factor
CEMS	8.7	1.4	11.1	1.4	8.7	1.4	11.1	1.4
HCl	8.3	1.4	11.5	1.4	8.7	1.4	11.2	1.4
Hg	8.3	1.4	11.5	1.4	8.7	1.4	11.1	1.4
PM	7.6	1.6	12.1	1.6	8.4	1.4	11.3	1.4
PCDD/PCDF					8.7	1.4	11.1	1.4
PAH					8.7	1.4	11.1	1.4
Metals	8.4	1.4	11.4	1.4				

Conclusion: The relationship of 7% O₂ to 12% CO₂ has been determined to be equal or 1:1. Therefore, the emission limits based on 7% O₂, indicated in the MACT Standards, are equivalent to the same numerical emission limit based on 12% CO₂.

ATTACHMENT F

**JUSTIFICATION OF ALTERNATE
INCREMENTS OF PROGRESS**



July 24, 1998

Ogden Martin Systems of Stanislaus
4040 Fink Rd., P.O. Box 278
Crows Landing, CA 95313
209 837 4423
Fax 209 837 4604

Air and Radiation Docket and Information Center (MC-6102)
ATTN: Docket No. A-97-45
United States Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Sir/Madam:

The purpose of this letter is to provide the rationale for the specific date differences in the increments of progress for the compliance schedule outlined in the proposed Federal Plan for Municipal Waste Combustors, 40 CFR Part 62 (63 FR 3509), and the California State 111(d) Plan/San Joaquin Valley Unified Air Pollution Control District Permit to Operate (PTO) No. N-2073-1-2, issued 03/17/98, for the Ogden Martin Systems of Stanislaus (OMSS) Facility, located in Crows Landing, California. For convenience, these increments of progress dates are listed below.

Increments of Progress	Submit final compliance plan	Award contracts for APC installation	Initiate on-site APC construction	Complete on-site APC construction	Demonstrate final compliance
Proposed Federal Plan (63 FR 3509)	09/21/98	05/18/99	11/14/99	11/19/00	12/19/00
CA State 111(d) Plan PTO N-2073-1-2	07/19/99	01/19/00	05/19/00	11/19/00	12/19/00
Requested site-specific schedule to be included in the Federal Plan	07/19/99	01/19/00	05/19/00	11/19/00	12/19/00

OMSS is one of 27 Resource Recovery facilities in the United States owned and operated by Ogden Energy Group, Inc. (OEG). The schedule of increment of progress submitted in the California State 111(d) Plan and PTO, were determined by the engineering team in charge of all MACT retrofits at these various OEG facilities. These dates were calculated with respect to scheduling conflicts, contract obligations to the client, including the City of Modesto and County of Stanislaus, and equipment and contractor availability. While the first three sub-compliance dates are different, OMSS contends that these dates are reasonable and do not jeopardize the final compliance date of December 19, 2000.

OEG provided comments on the proposed Federal Plan in the correspondence dated March 24, 1998, requesting that EPA modify the implementation schedule to be consistent with the schedule established in the current PTO and California State 111(d) Plan. Further conversations with EPA have indicated that alternative compliance schedules will be accepted for cases where a state 111(d) plan has been issued. In addition, once the California State 111(d) Plan has been approved by the U.S. EPA, OMSS will not be subject to the schedule in the Federal Plan.

Should you have any questions regarding this matter, please contact me at (209) 837-4423.

Sincerely,



Jill C. Reed
Environmental Compliance Engineer

cc: Mr. Richard Boyd
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812-2815

Ms. Julie McClintock
United States Environmental Protection Agency
MD-12
Research Triangle Park, NC 27711

Mr. Anthony Mendes
San Joaquin Valley Unified Air Pollution Control District
4230 Kiernan Avenue, Suite 130
Modesto, CA 95356-9321

Mr. Leon Brasowski
Ogden Energy Group, Inc.
40 Lane Road
P.O. Box 2615
Fairfield, NJ 07007-2615

Mr. Derek Porter
Ogden Energy Group, Inc.
40 Lane Road
P.O. Box 2615
Fairfield, NJ 07007-2615